# Case 2:18-cv-00002-BMM Document 241 Filed 03/08/21 Page 1 of 38 EVI DIXON

#### Page 1 Page 3 IN THE UNITED STATES DISTRICT COURT INDEX EXAMINATION OF EVI DIXON BY PAGE FOR THE DISTRICT OF MONTANA 3 BUTTE DIVISION EXHIBITS REFERRED TO: Exhibit 24......19 Exhibit 25.. JOHN MEYER, 6 Exhibit 70..... DEPOSITION EXHIBITS: Cause No. 18-CV-00002-BMM VS. Exhibit 89 E-mail between Evi Dixon BIG SKY RESORT, Defendant. 10 11 VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF 12 EVI DIXON Exhibit 91 Packet of documents labeled E.Dixon001 through E.Dixon060..26-27, 29, 31, 41-43, 46, 84, 88 13 14 BE IT REMEMBERED, that the videotaped Exhibit 92 Excerpt from John Meyer's deposition dated 15 deposition upon oral examination of EVI DIXON, April 9, 2019..... 16 appearing at the instance of Defendant, was taken Exhibit 93 E-mails between Evi Dixon at the offices of Crowley Fleck, PLLP, 1915 South and John Meyer Bates Numbered E.Dixon063 through 17 19th Avenue, Bozeman, Montana, 59718, on the 9th E.Dixon068....41, 46, 57, 59, 60, 86 Exhibit 94 E-mails between Evi Dixon and John Meyer Bates Numbered E.Dixon069 through 19 day of March 2020, beginning at the hour of 10:01 20 a.m. pursuant to the Federal Rules of Civil E.Dixon087......61-63, 65, 69-71 Procedure, before Marla Jeske, Court Reporter -21 Exhibit 95 Letter to Mr. Meyer from Notary Public, CSR. 22 Ian McIntosh, dated December 27, 2017... 23 Exhibit 96 E-mails between Evi Dixon 2.4 and John Meyer Bates Numbered E.Dixon088 through 25 E.Dixon99. Page 2 Page 4 APPEARANCES 1 WHEREUPON, the following proceedings were had 2 2 and testimony taken, to-wit: ATTORNEY APPEARING ON BEHALF OF THE 3 3 PLAINTIFF, JOHN MEYER: 4 4 Ms. Breean Walas, Esq. 5 Walas Law Firm P.O. Box 4591 6 VIDEO TECHNICIAN: This is the time and place Bozeman, Montana 59772 6 7 set for the video deposition of Evi Dixon in the breean@walaslawfirm.com 8 case of John Meyer, plaintiff, versus Big Sky 7 (501) 246-1067 8 9 Resort, defendant. It is Cause Number ATTORNEYS APPEARING ON BEHALF OF THE 10 18-CV-0002-BMM in the United States District Court 9 DEFENDANT, BIG SKY RESORT: 10 11 for the District of Montana, Butte Division. Mr. Ian McIntosh, Esq. 12 This video deposition is being held at 11 Mr. Mac Morris, Esq. 13 the offices of Crowley Fleck, located at 1915 19th CROWLEY FLECK PLLP 12 1915 South 19th Avenue 14 Avenue in Bozeman, Montana. P.O. Box 10969 15 Today's date is March 9th, 2020. The 13 Bozeman, MT 59719-0969 imcintosh@crowleyfleck.com 16 time is 10:01 a.m. The court reporter is Marla wmorris@crowleyfleck.com 14 17 Jeske with Bridger Court Reporting. I'm Mark (406) 556-1430 18 Brown, the videographer. 15 16 19 Will the attorneys now please identify 17 ALSO PRESENT: 20 themselves for the record. 18 Mike Unruh 19 21 MS. WALAS: Breean Walas for the plaintiff. 20 22 MR. McINTOSH: Ian McIntosh and Mac Morris 21 23 for Defendant Big Sky Resort. 2.2 23 24 VIDEO TECHNICIAN: Will the witness now 24 25 please be sworn in. 25

1 (Pages 1 to 4)

	Page 5		Page 7
1	EVI DIXON,	1	A. I don't think I lied about it because I
2	called as a witness herein, having been first duly	2	did not have any communication about the case with
3	sworn, was examined and testified as follows:	3	John Meyer, because you came to me and said I'm not
4	,	4	supposed to talk to him and I said no, I'm not
5	MS. WALAS: The parties have agreed that the	5	talking to him about the case.
6	second deposition of plaintiff's expert Evi Dixon	6	Q. I'm going to hand you a copy of your
7	shall be taken at plaintiff's expense and is	7	prior deposition transcript. Open to page 7.
8	limited to questioning regarding the documents	8	A. Okay.
9	produced by Ms. Dixon since her first deposition	9	Q. You looking at page 7?
10	taken January 24th, 2020.	10	A. Yep, page 25 to 28 page.
11	Those documents have been identified as	11	Q. No.
12	E.Dixon 1 to 99, and the documents produced today	12	A. Page 7?
13	prior to this deposition, E.Dixon 100 to 115.	13	Q. Page 7.
14	MR. McINTOSH: Thank you. And, of course,	14	A. So which number do you count, the first
15	that's agreeable. But as indicated in my e-mail,	15	or the second or the third?
16	some of the materials that were recently produced	16	Q. Page 7 of the deposition transcript.
17	touch on subjects that were already raised in the	17	A. Okay.
18	first deposition and we would have asked	18	Q. Page 7 of the deposition transcript.
19	questions differently if we would have had the	19	A. Yep.
20	questions or, excuse me, if we would have had	20	Q. This is the page number.
21	the documents during the first deposition. So I	21	A. Well, then you need to say the second.
22	certainly don't intend to re-plow any ground from	22	Q. At line 2 you were asked, "So are you
23	the first deposition, but it may touch on subjects	23	prepared to give accurate and truthful testimony
24	of the first deposition.	24 25	today?" And you said "Yes," didn't you?
25	///	25	A. "So you are prepared to give accurate,"
	Page 6		Page 8
1	Page 6 EXAMINATION	1	Page 8 yep.
1 2	EXAMINATION BY MR. McINTOSH:	1 2	yep. Q. That's what you said. So when we were
	EXAMINATION BY MR. McINTOSH: Q. Ms. Dixon, you were just sworn and you	2 3	yep. Q. That's what you said. So when we were here previously, you testified that you were going
2 3 4	EXAMINATION BY MR. McINTOSH: Q. Ms. Dixon, you were just sworn and you said you would tell the truth, correct?	2 3 4	yep.  Q. That's what you said. So when we were here previously, you testified that you were going to tell the truth, right?
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	Page 9		Page 11
1	would have said if you asked me the question,	1	A. To me it was because it was to me it
2	did you have any communication with John Meyer	2	was clear that since I was hired as an expert
3	starting in November, I would have said yes	3	witness that we had communications about the
4	because I	4	accident.
5	Q. The next question you were asked was,	5	Q. So why didn't you tell me that when you
6	"You've never had any correspondence with Mr. Meyer	6	were testifying under oath?
7	about his accident," right? That's what you were	7	A. I don't know why I didn't tell you that.
8	asked on page 13, line 23; correct?	8	Q. You didn't tell me that because you were
9	A. Yep, yep.	9	trying to cover up the truth, weren't you?
10	Q. And your answer was "During during	10	A. No, I wasn't trying to cover up the
11	the time his lawsuit is going, no." That was a	11	truth.
12	lie, wasn't it?	12	Q. Because you didn't want to answer
13	A. I don't remember.	13	questions about what you talked about with
14	Q. There's nothing to remember.	14	Mr. Meyer, correct?
15	A. Yeah, I know it sitting here, but I mean	15	A. No.
16	for me it was I don't understand. Because when	16	Q. So why then did you lie under oath?
17	he hired me to be an expert witness, of course we	17	A. I don't know.
18	had communications. But during my employment in	18	Q. You just lied for no reason?
19	Big Sky, I did not have any communication with John	19	A. I didn't want to lie. I had a totally
20	Meyer. And in my opinion, because we had this talk	20	misunderstanding.
21	up in my office that when you came up to me and	21	Q. Did Mr. Meyer tell you not to tell me
22	said you are not supposed to talk to John Meyer, do	22	about your conversations with him?
23	you remember that? You said you're friends on	23 24	MS. WALAS: Objection. THE WITNESS: No.
24	Facebook with John Meyer and you're not supposed to	25	/// /// /// /// /// /// /// /// /// //
25	talk with John Meyer, and I never did.	25	III
	Page 10		Page 12
1	Q. You're lying again right now in this	1	BY MR. McINTOSH:
2	Q. You're lying again right now in this deposition, aren't you, Ms. Dixon?	2	BY MR. McINTOSH:  Q. So you just chose to not tell the truth
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2 3 4 5 6	<ul> <li>Q. You're lying again right now in this deposition, aren't you, Ms. Dixon?</li> <li>A. I'm and then when he hired me as an expert witness, yes, we had communication about his accident.</li> <li>Q. Look at page 15, line 6 of your prior</li> </ul>	2 3 4 5 6	BY MR. McINTOSH:  Q. So you just chose to not tell the truth on your own?  MS. WALAS: Objection. This is beyond the scope of the documents that have been produced.  THE WITNESS: I
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	Page 13	Page 15	;
1	then I'll we'll go from there.	1 thanking him for the pictures he took of my	
2	BY MR. McINTOSH:	2 alpacas," correct?	
3	Q. Your first deposition you denied	3 A. Correct.	
4	having excuse me, you denied providing Mr. Meyer	4 Q. But in fact – and then you were asked	
5	with the e-mail addresses of all the ski	5 "Anything else?" And you said, "No," right?	
6	patrollers, didn't you?	6 A. It's written here, yes.	
7	A. Because I didn't remember that.	7 Q. And in fact in the month just the	
8	Q. So you did not admit to doing that until	8 month before your deposition, you'd had over 48	
9	we actually showed you the e-mail, right?	9 texts alone with Mr. Meyer; isn't that true?	
10	A. Yeah, because then you showed me the	10 A. That's correct. But as I already said,	
11	evidence and then I remembered it, but it was not	in my opinion it was during my employment with Big	
12	in my memory.	12 Sky.	
13	Q. Turn to page 118 of your deposition	Q. This question doesn't limit it to your	
14	transcript. Look at line 13, please. Excuse me,	14 employment with Big Sky.	
15	line 11, I'm sorry. You were asked, "Is there any	15 A. I understand that. I understand that.	
16	other inaccurate or untruthful testimony that you	But it was in my opinion that it was like this.	
17	provided here today?"	Q. So do you think that you can insert your	
18	And you said, "I don't think so," right?	opinion about what the truth is?	
19	A. Yes, it says here.	19 A. No.	
20	Q. That was not truthful testimony either,	Q. So there's the truth and then there's	
21	was it?	21 not the truth, right?	
22	A. I don't know.	A. Yep, you can say I lied.	
23	Q. How many false statements did you make	Q. And in fact, you had communications with	
24	during your first deposition?	24 Mr. Meyer while you were still employed at Big Sky.	,
25	A. I don't know. I did not intend to do	25 didn't you?	
	Page 14	Page 16	;
1	any false statements because I'm an honest person	1 A. Yeah, they came to take pictures and	
	any faise statements because I in an nonest person	F	
2	and I tried to honestly answer questions as much as	2 it's written in here. He came.	
	-		
2	and I tried to honestly answer questions as much as	2 it's written in here. He came.	
2	and I tried to honestly answer questions as much as it allows my consciousness.	2 it's written in here. He came. 3 Q. You had communications with Mr. Meyer	
2 3 4	and I tried to honestly answer questions as much as it allows my consciousness.  Q. Do you think that your consciousness	2 it's written in here. He came. 3 Q. You had communications with Mr. Meyer 4 about things other than him taking pictures, didn't 5 you, while you were employed at Big Sky? 6 A. About craniosacral therapy.	
2 3 4 5	and I tried to honestly answer questions as much as it allows my consciousness.  Q. Do you think that your consciousness allows you to disobey subpoenas?  A. No.  Q. Do you think your consciousness allows	2 it's written in here. He came.  3 Q. You had communications with Mr. Meyer 4 about things other than him taking pictures, didn't 5 you, while you were employed at Big Sky? 6 A. About craniosacral therapy. 7 Q. And you didn't tell me about that when	
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	Page 17		Page 19
1	correspondence? What's ambiguous about all	1	got that report from Mr. Petrozzi.
2	correspondence?	2	Q. What pictures of Highway and Loop Road
3	A. No.	3	did Mr. Meyer show you?
4	Q. Do you agree that's clear, right?	4	A. The one where the people standing on the
5	A. What is clear?	5	Loop Road, mainly. That's what I remember.
6	Q. When you were directed to produce all of	6	Q. Is it Exhibit 29? You have the exhibits
7	your correspondence, that's clear?	7	right there in front of you.
8	A. I did not produce it for the first and I	8	A. Where? I should look through this?
9	got the second subpoena and I worked with Breean	9	That's mine?
10	Walas and we put it all together now.	10	Q. Excuse me, not 29. Exhibit 24.
11	Q. What did you discuss with Mr. Meyer	11	A. Is this the number here? No, that was
12	before your first deposition?	12	not the picture.
13	A. Um, I don't know how to tell you that.	13	Q. Exhibit 25.
14	We discussed the accident. I don't know if we	14	A. This one. I think it was this one.
15	discussed the accident because I was the accident	15	Q. Did you review any pictures other than
16	investigator and he showed me the pictures that he	16	Exhibit 25 with Mr. Meyer prior to your deposition?
17	had from the accident investigation. I can't	17	A. Um, can I look at them? I don't think I
18	repeat every word we said.	18	looked at all these pictures. No, I don't think
19	Q. What else did you discuss with Mr. Meyer	19	so. Do I have to go through the whole of more
20	before your first deposition?	20	pictures?
21	A. We talked about all kinds of different	21	Q. It's a simple question. Did you review
22	things. Do you need all the subjects we talked	22	any pictures other than Exhibit 25 prior to your
23	about or just concerning the accident or the	23	deposition?
24	deposition or what? I don't understand the	24	A. I don't think there were any other
25	question.	25	pictures there, but. There could have been other
	•		•
	Page 18		Page 20
1	Q. Ms. Dixon, it's a very clear question.	1	pictures but, this was the main picture that I saw
2	Q. Ms. Dixon, it's a very clear question. I asked you what you discussed with Mr. Meyer, do	2	pictures but, this was the main picture that I saw and that we looked at and
2	Q. Ms. Dixon, it's a very clear question. I asked you what you discussed with Mr. Meyer, do you understand that?	2 3	pictures but, this was the main picture that I saw and that we looked at and  Q. What did you discuss with Mr. Meyer
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2 3 4 5	Q. Ms. Dixon, it's a very clear question.  I asked you what you discussed with Mr. Meyer, do you understand that?  A. Yes, but do you want our whole conversation? I don't have a record of the	2 3 4 5	pictures but, this was the main picture that I saw and that we looked at and  Q. What did you discuss with Mr. Meyer about his accident prior to your first deposition?  A. We talked about who was the accident
2 3 4 5 6	Q. Ms. Dixon, it's a very clear question.  I asked you what you discussed with Mr. Meyer, do you understand that?  A. Yes, but do you want our whole conversation? I don't have a record of the conversation. I didn't	2 3 4 5 6	pictures but, this was the main picture that I saw and that we looked at and  Q. What did you discuss with Mr. Meyer about his accident prior to your first deposition?  A. We talked about who was the accident investigator, who was first on scene, that I was
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	Page 21		Page 23
1	mountain, you did mark things that you thought	1	MS. WALAS: Objection, calls for a legal
2	needed to be marked or you told someone else to	2	conclusion.
3	mark it, didn't you?	3	BY MR. McINTOSH:
4	A. I did not talk to somebody else to mark	4	Q. Did I read that correctly?
5	it.	5	A. Yeah.
6	Q. Well, you're making more false	6	Q. And you knowingly made false statements
7	statements under oath, aren't you, Ms. Dixon?	7	under oath in your first deposition, didn't you?
8	A. No.	8	A. Not knowingly.
9	Q. Didn't you specifically write to	9	Q. Oh, so you agree you made false
10	Mr. Meyer that when you were out patrolling, if you	10	statements but you contend it was unknowingly?
11	saw a hazard, you would mark it or you would tell a	11	A. As I said before and I know you said
12	supervisor to mark it?	12	I can't put my opinion in there but people are
13	A. Well, I might have discussed with	13	asked answering questions from their conscious
14	a supervisor if we should mark it because he	14	thinking or from their feeling. I am not a logical
15	is that's his job and I might have said, you	15	person and I was under the thought that I you
16	know, there's a trail merge sign missing, should we	16	asked me about during my employment because I was
17	go and mark it? And then I usually went and marked	17	not allowed to talk to Mr. Meyer during my Big Sky
18	it because I wasn't out there that much. So I was	18	employment and that's what I I didn't do that
19	happy to do some normal patrol work.	19	concerning that.
20	Q. Mr. Meyer told you not to communicate	20	Q. Go back to page 15 of your deposition
21	with me or anyone from my office, didn't he?	21	transcript, page 6 or excuse me, page 15, line
22	A. I don't remember that he said that.	22	6. Excuse me.
23	(Whereupon, Deposition	23	A. Yep.
24	Exhibit Number 90 was	24 25	Q. And when you were asked did you have any
25	marked for identification.)	25	written correspondence either by e-mail, text,
	Page 22		Page 24
1	Page 22 BY MR. McINTOSH:	1	Page 24 Facebook or any method with Mr. Meyer, that
1 2		1 2	
	BY MR. McINTOSH:		Facebook or any method with Mr. Meyer, that
2	BY MR. McINTOSH:  Q. I'm going to hand you what I'm marking	2	Facebook or any method with Mr. Meyer, that question is not limited to your time while you were
2	BY MR. McINTOSH:  Q. I'm going to hand you what I'm marking as Exhibit 90. Please review that.  A. Are you trying to kill me with your eyes or what? What is this?	2 3	Facebook or any method with Mr. Meyer, that question is not limited to your time while you were employed at Big Sky, is it?  A. No.  Q. And then you were asked "Anything else,"
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	Page 25		Page 27
1	it wrong but I didn't want to lie. I wanted to	1	MS. WALAS: Is my e-mail, okay.
2	tell you what I knew and what what my truth is.	2	MR. McINTOSH: So I took that off.
3	I am not a person who's lying. I'm probably the	3	BY MR. McINTOSH:
4	most honest person there is. I'm surrounded by	4	Q. Ms. Dixon, you now have before you
5	liars, but I am the most honest person and I can	5	what's been marked as Exhibit 91; is that correct?
6	only tell you what I believe my truth is.	6	A. Correct.
7	Q. After your first deposition Ms. Walas	7	Q. And these are all documents that you
8	asked you to give to provide her with all of	8	produced to Ms. Walas shortly after your first
9	your correspondence with Mr. Meyer, correct?	9	deposition, correct?
10	A. Correct.	10	A. Correct, uh-huh.
11	Q. And did you do so?	11	Q. Is that a yes?
12	A. Yes.	12	A. Yes.
13	Q. And so as soon as Ms. Walas asked you to	13	Q. And these documents include e-mails,
14	provide your correspondence with Mr. Meyer, you did	14	texts, and Facebook messages with Mr. Meyer,
15	that within how quickly, a matter of days,	15	correct?
16	right?	16	A. Correct.
17	A. Probably one day.	17	Q. Look at the first page of Exhibit 91.
18	Q. And yet, when we asked you to produce	18	That is a letter that Mr. Meyer produced to me when
19	all of your correspondence with Mr. Meyer with a	19	he previously provided me with the computer that
20	subpoena, you did not do that, did you?	20	you had from Big Sky; is that right?
21	A. We've been there. No, I didn't.	21	A. Say that again, question?
22	Q. Because you were trying to intentionally	22	Q. Look at the first page.
23	hide your correspondence with Mr. Meyer, weren't	23	A. Uh-huh.
24	you?	24	Q. You're not looking at the first page,
25	A. No, I wasn't trying anything	25	are you?
	Page 26		Page 28
1	Page 26 intentionally.	1	Page 28  A. Oh, here?
1 2	intentionally.  Q. Why then, when I asked you to produce	1 2	<ul><li>A. Oh, here?</li><li>Q. Yeah. First page. You're on the first</li></ul>
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2 3 4 5	one intentionally.  Q. Why then, when I asked you to produce your correspondence with Mr. Meyer, did you fail to do so; yet, when Ms. Walas asked you to do the exact same thing, you produced the correspondence	2 3 4 5	<ul> <li>A. Oh, here?</li> <li>Q. Yeah. First page. You're on the first page?</li> <li>A. Yes.</li> <li>Q. That is a letter from John Meyer to me,</li> </ul>
2 3 4 5 6	one intentionally.  Q. Why then, when I asked you to produce your correspondence with Mr. Meyer, did you fail to do so; yet, when Ms. Walas asked you to do the exact same thing, you produced the correspondence within 24 hours?	2 3 4 5 6	<ul> <li>A. Oh, here?</li> <li>Q. Yeah. First page. You're on the first page?</li> <li>A. Yes.</li> <li>Q. That is a letter from John Meyer to me, correct?</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Why then, when I asked you to produce your correspondence with Mr. Meyer, did you fail to do so; yet, when Ms. Walas asked you to do the exact same thing, you produced the correspondence within 24 hours?  A. I don't know.  Q. There's no logical response, is there?  A. No.  (Whereupon, Deposition Exhibit Number 91 was marked for identification.)  BY MR. McINTOSH:  Q. I'm going to hand you what I've marked as Exhibit 91.  A. Yep, I read all through this. MR. McINTOSH: I have a copy for you. THE WITNESS: All the e-mails.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Oh, here? Q. Yeah. First page. You're on the first page? A. Yes. Q. That is a letter from John Meyer to me, correct? A. Correct. Q. And that's the letter that Mr. Meyer gave to me when he gave me your computer from Big Sky, right? A. Okay. Q. Is that right? A. Yes, if you say so. Q. And did you well, first of all, you still had your Big Sky computer in your possession when you received the first subpoena; is that true? A. Yes. Q. And did you tell Mr. Meyer that all of
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	intentionally.  Q. Why then, when I asked you to produce your correspondence with Mr. Meyer, did you fail to do so; yet, when Ms. Walas asked you to do the exact same thing, you produced the correspondence within 24 hours?  A. I don't know.  Q. There's no logical response, is there?  A. No.  (Whereupon, Deposition Exhibit Number 91 was marked for identification.)  BY MR. McINTOSH:  Q. I'm going to hand you what I've marked as Exhibit 91.  A. Yep, I read all through this.  MR. McINTOSH: I have a copy for you.  THE WITNESS: All the e-mails.  COURT REPORTER: I think she has two.  MR. McINTOSH: Oh, I'm sorry. One is for Ms. Walas and one is for Ms. Dixon.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Oh, here? Q. Yeah. First page. You're on the first page? A. Yes. Q. That is a letter from John Meyer to me, correct? A. Correct. Q. And that's the letter that Mr. Meyer gave to me when he gave me your computer from Big Sky, right? A. Okay. Q. Is that right? A. Yes, if you say so. Q. And did you well, first of all, you still had your Big Sky computer in your possession when you received the first subpoena; is that true? A. Yes. Q. And did you tell Mr. Meyer that all of your correspondence with him was on that computer? A. I said this is the whole thing that I have from Big Sky. I don't have any other any
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	Page 29		Page 31
1	Q. Okay. Look at Exhibit 70, which is	1 not aware that I had to report ev	very little
2	right in front of you. Exhibit 70, right here.	2 photograph taken, communicati	-
3	A. You mean here on the number?	3 communication or craniosacral	communication. I
4	Q. Exhibit 70 is the first subpoena that we	4 mean we are all human beings a	and we talk and I
5	served on you, correct?	5 wasn't aware that this is importa	nnt. I'm sorry.
6	A. Uh-huh.	6 Q. So you think when it s	says all
7	Q. Is that right?	7 correspondence, including e-m	-
8	A. Yep, I got that per e-mail.	8 that's not clear?	•
9	Q. And well, you didn't receive it by	9 A. It wasn't clear to me.	
10	e-mail, did you? You were served with that	O Q. But you were dealing	we're
11	subpoena by a process server, right?	specifically talking about Exh	
12	A. I think I got it per e-mail but I'm	2 You were dealing with Mr. M	eyer and he was helping
13	not I don't remember.	you respond to the subpoena,	
14	Q. And you were specifically asked to	A. Yes, and we talked about	-
15	produce all correspondence, including e-mails or	.5 said	
16	texts with Mr. Meyer or anyone acting on his	Q. Please just answer the	questions,
17	behalf, right?	.7 please.	•
18	A. Yeah.	.8 A. Sorry, sorry.	
19	Q. Going back to Exhibit 91, do you have	9 Q. You were working wit	th Mr. Mever to
20	that in front of you, first page of Exhibit 91?	respond to the first subpoena	
21	A. Yep.	you, right?	
22	Q. That's the letter from Mr. Meyer, right?	A. He sent me I don't thi	nk I was served
23	A. Yep.	that subpoena. He sent it to me	per e-mail and
24	Q. And in the third paragraph there it	then I was asking him I reme	•
25	states - Mr. Meyer states, Ms. Dixon has indicated	get that in person?"	, ,
	·		
	Page 30		Page 32
1	that she does not have any documents other than	1 And he said "I don't kno	w."
2	that she does not have any documents other than what I have produced, do you see that?	2 And then I said, "I don't	w."
2	that she does not have any documents other than what I have produced, do you see that?  A. Yep.	2 And then I said, "I don't 3 should bring."	w." know what I
2 3 4	that she does not have any documents other than what I have produced, do you see that?  A. Yep.  Q. And that statement from Mr. Meyer was	2 And then I said, "I don't 3 should bring." 4 And he said "Everything	w." know what I g that you have
2 3 4 5	that she does not have any documents other than what I have produced, do you see that?  A. Yep.  Q. And that statement from Mr. Meyer was false, wasn't it?	2 And then I said, "I don't 3 should bring." 4 And he said "Everything 5 from Big Sky," and that's what	w." know what I g that you have I brought. I
2 3 4 5 6	that she does not have any documents other than what I have produced, do you see that?  A. Yep.  Q. And that statement from Mr. Meyer was false, wasn't it?  A. Um, obviously false because we have	And then I said, "I don't should bring."  And he said "Everything from Big Sky," and that's what brought my laptop that I had from	w." know what I g that you have I brought. I om Big Sky because
2 3 4 5 6 7	that she does not have any documents other than what I have produced, do you see that?  A. Yep.  Q. And that statement from Mr. Meyer was false, wasn't it?  A. Um, obviously false because we have now all the other documents that I provided to	And then I said, "I don't should bring."  And he said "Everything from Big Sky," and that's what brought my laptop that I had fro that was the only thing that I ha	w." know what I g that you have I brought. I om Big Sky because id.
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	Page 33		Page 35
1	Q. And Mr. Meyer did not produce those in	1	from Big Sky." That's what I have, that's what I
2	response to the subpoena, did he?	2	provided.
3	A. I don't know if he did or not.	3	Q. Ms
4	Q. Well, you know all he produced was your	4	A. We didn't he didn't I'm not done.
5	computer?	5	He did not tell
6	A. It says right here, yes. Now I know,	6	Q. Ms. Dixon, you're not answering the
7	but I didn't know before that if he if he	7	question. I'm asking you questions and instead of
8	produced it. I don't know what he does and what	8	answering the questions, you're just making
9	you guys talk.	9	speeches about things you weren't asked about.
10	Q. Well, Ms. Dixon, you do know that he	10	A. Because I can't answer this with yes or
11	didn't produce all of your correspondence or else	11	no because it's not how it is. It's not that he
12	we wouldn't be back here today asking you about all	12	assisted me to lie or assisted me to not produce
13	these things for the first time, right?	13	it. That is not the case.
14	A. Correct.	14	Q. So you're saying he did it on his own?
15	Q. Okay. So you know that he didn't	15	You're saying Mr. Meyer submitted a false response
16	produce it in response to the first subpoena?	16	on his own without any help from you?
17	A. I didn't produce it. I can only say	17	MS. WALAS: Objection, calls for speculation.
18	what I didn't do. I don't know what he did.	18	THE WITNESS: I don't know. This is really
19	Q. You know that he didn't produce his	19	out of my I don't know what he's thinking. I
20	correspondence with you in response to the first	20	can only say what I am feeling or thinking and I
21	subpoena?	21	don't know. I can't say any answer to that.
22	A. Well, I just read that he just gave you	22	Sorry.
23	the laptop. You just told me that.	23	BY MR. McINTOSH:
24	Q. And you knew that before day, right?	24	Q. What did you do to prepare for the
25	A. I didn't I don't know. I	25	deposition today?
	Page 34		Page 36
1	Page 34 didn't it's not my concern what Mr. Meyer	1	Page 36  A. We talked this morning and I read
1 2		1 2	
	didn't it's not my concern what Mr. Meyer		A. We talked this morning and I read
2	didn't it's not my concern what Mr. Meyer produces and not produces because my concern was	2	A. We talked this morning and I read through my deposition and pretty much, and my
2	didn't it's not my concern what Mr. Meyer produces and not produces because my concern was now to find all my text messages.	2	A. We talked this morning and I read through my deposition and pretty much, and my e-mails and my text messages that I sent.
2 3 4	didn't it's not my concern what Mr. Meyer produces and not produces because my concern was now to find all my text messages.  Q. And you agree that Mr. Meyer's response	2 3 4	A. We talked this morning and I read through my deposition and pretty much, and my e-mails and my text messages that I sent.  Q. Who did you you said "we" talked this
2 3 4 5	didn't it's not my concern what Mr. Meyer produces and not produces because my concern was now to find all my text messages.  Q. And you agree that Mr. Meyer's response here, "Ms. Dixon has indicated that she does not	2 3 4 5	A. We talked this morning and I read through my deposition and pretty much, and my e-mails and my text messages that I sent.  Q. Who did you you said "we" talked this morning, who's "we"?
2 3 4 5 6	didn't it's not my concern what Mr. Meyer produces and not produces because my concern was now to find all my text messages.  Q. And you agree that Mr. Meyer's response here, "Ms. Dixon has indicated that she does not have any documents other than what I have already	2 3 4 5 6 7 8	A. We talked this morning and I read through my deposition and pretty much, and my e-mails and my text messages that I sent.  Q. Who did you you said "we" talked this morning, who's "we"?  A. Breean and I.  Q. Did you speak with Mr. Meyer?  A. No.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	didn't it's not my concern what Mr. Meyer produces and not produces because my concern was now to find all my text messages.  Q. And you agree that Mr. Meyer's response here, "Ms. Dixon has indicated that she does not have any documents other than what I have already produced," that is a false response to a subpoena, isn't it?  A. You should tell him that.  Q. But you know it's false? The question is to you, do you understand that?  A. Yes, it is not yeah, he only got my laptop at that time, December 11th. And the subpoena came when? I had to report the laptop by December 13th.  Q. So you agree that Mr. Meyer submitted a false subpoena response, right?  A. He didn't subpoena a false one. He just gave what I gave him.  Q. He assisted you in providing a false subpoena response, didn't he?  A. You make it happen as if we are trying	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. We talked this morning and I read through my deposition and pretty much, and my e-mails and my text messages that I sent.  Q. Who did you you said "we" talked this morning, who's "we"?  A. Breean and I.  Q. Did you speak with Mr. Meyer?  A. No.  Q. Have you spoken with Mr. Meyer from the time of your first deposition until today?  A. Um, he asked me how I was doing after the deposition and I said good, I'm exhausted. And I don't know what else I said, and I can probably find it in the deposition, and I wished him a happy birthday yesterday.  Q. How did you talk to him yesterday?  A. I wished him a happy birthday via Facebook I think.  Q. And you haven't submitted that correspondence?  A. Um, did I give that to you? Yeah, I think so.

	Page 37		Page 39
1	the time of your deposition, right?	1	Q. Are you looking at page 270?
2	A. I showed Breean that last text that I	2	A. Yes.
3	sent to him.	3	Q. And do you see line 4, Mr. Meyer was
4	Q. I don't believe that's been produced, am	4	asked
5	I wrong?	5	A. Yeah, I see.
6	MS. WALAS: I don't believe it's covered	6	Q "Did you know her do you still
7	within the scope of the subpoena, a birthday, happy	7	communicate with Ms. Dixon?" Do you see that
8	birthday.	8	question?
9	BY MR. McINTOSH:	9	A. Yeah.
10	Q. It says all correspondence with	10	Q. And Mr. Meyer answered "No," didn't he?
11	Mr. Meyer or anyone acting on his behalf.	11	A. That was April 9th, 2019. Yes.
12	A. I can show you the message on my phone.	12	Q. That was a that answer was a lie,
13	Q. What else did you do to prepare for	13	wasn't it?
14	today that you haven't told us about yet?	14	A. No.
15	A. I think I told you everything.	15	Q. It was a false statement, wasn't it?
16	Q. Do you have a lawyer, a personal lawyer?	16	A. No, we did not communicate.
17	A. No.	17	Q. So it's your testimony that you were not
18	Q. Have you spoken with a criminal lawyer?	18	communicating in April of 2019 with Mr. Meyer?
19	A. No.	19	A. I don't think so. Because I was still
20	Q. You are not a citizen, correct?	20	an employee in Big Sky and I have had no
21	A. Correct.	21	communication with him since we talked about that I
22	Q. You are a citizen of what country?	22	am not supposed to talk to him.
23	A. Austria.	23	Q. Ms. Dixon, that simply isn't true, is
24	Q. Did you have you ever reviewed	24	it? You were exchanging texts and e-mails with
25	Mr. Meyer's deposition transcript?	25	Mr. Meyer in the months leading up to April 9,
	Dama 20		Daga 40
	Page 38	_	Page 40
1	A. No.	1	2019, weren't you?
2	<ul><li>A. No.</li><li>Q. So you formed your opinions in this case</li></ul>	2	2019, weren't you?  A. Before that.
2	A. No. Q. So you formed your opinions in this case without even reviewing Mr. Meyer's deposition	2 3	2019, weren't you?  A. Before that.  Q. Right. Before April 9, 2019, you were
2 3 4	A. No. Q. So you formed your opinions in this case without even reviewing Mr. Meyer's deposition transcript?	2 3 4	2019, weren't you?  A. Before that.  Q. Right. Before April 9, 2019, you were exchanging texts and e-mails with Mr. Meyer?
2 3 4 5	A. No. Q. So you formed your opinions in this case without even reviewing Mr. Meyer's deposition transcript? A. I don't think I ever saw it.	2 3 4 5	2019, weren't you?  A. Before that.  Q. Right. Before April 9, 2019, you were exchanging texts and e-mails with Mr. Meyer?  A. I think it was before 2018 though. I
2 3 4 5 6	A. No. Q. So you formed your opinions in this case without even reviewing Mr. Meyer's deposition transcript? A. I don't think I ever saw it. Q. That wasn't the question I asked.	2 3 4 5 6	2019, weren't you?  A. Before that.  Q. Right. Before April 9, 2019, you were exchanging texts and e-mails with Mr. Meyer?  A. I think it was before 2018 though. I don't remember when we talked in the office, but I
2 3 4 5 6 7	<ul> <li>A. No.</li> <li>Q. So you formed your opinions in this case without even reviewing Mr. Meyer's deposition transcript?</li> <li>A. I don't think I ever saw it.</li> <li>Q. That wasn't the question I asked.</li> <li>A. I don't think I ever got it sent to me.</li> </ul>	2 3 4 5 6 7	2019, weren't you?  A. Before that.  Q. Right. Before April 9, 2019, you were exchanging texts and e-mails with Mr. Meyer?  A. I think it was before 2018 though. I don't remember when we talked in the office, but I was looking through the texts that we had here and
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	Page 41	Page 43	
1	invited him to your house?	1 of you in your hands, are all of those e-mails	
2	A. I don't remember inviting him to my	2 e-mails that you sent from your laptop?	
3	house.	A. Or from my phone, yes.	
4	Q. Let's look at Exhibit 93.	4 Q. Well, Ms. Dixon okay. The e-mails	
5	(Whereupon, Deposition	5 shown like, for example, look at the format of	
6	Exhibit Number 93 was	6 the e-mail shown in Exhibit E.Dixon 21 or excuse	
7	marked for identification.)	7 me, page E.Dixon 21.	
8	BY MR. McINTOSH:	8 A. 21?	
9	Q. First of all, you do agree that you	9 Q. Do you see that? Yes.	
10	communicated with Mr. Meyer by text, right?	10 A. I'm on page 29.	
11	A. Yes.	Q. Yes. You can look at 21, you can look	
12	Q. You communicated with him by Facebook	12 at 22, 23, 24, every page from 29. Do you see the	
13	messages, right?	13 format that those e-mails are in?	
14	A. Yeah.	14 A. Yeah.	
15	Q. You communicated with him by e-mail,	Q. Then I want you to go back to page	
16	correct?	16 E.Dixon 53.	
17	A. Correct.	A. Back. These are text messages or	
18	Q. And you did all those things from your	18 Facebook messages.	
19	telephone, correct?	Q. Well, on page 53, those are messages to	
20	A. Or from my laptop.	an address john@cottonwoodlaw.org, correct?	
21	Q. And correct. So if we look back at	A. Yep, I didn't read it. Yes.	
22	Exhibit 91, that was the it starts with E.Dixon	Q. Okay. So this is a very simple	
23	001 and then a number of e-mails are produced in	question, Ms. Dixon. The e-mails that are shown in	
24	there?	the format that is on page E.Dixon 25.	
25	A. Yes.	25 A. Yeah, that's e-mails.	
			_
	Page 42	Page 44	
1	Page 42  Q. For example, if you go to	Page 44  1 Q. Those are different formats or	
1 2			
	Q. For example, if you go to	1 Q. Those are different formats or	
2	Q. For example, if you go to exhibit let's see, I'm sorry. Page E.Dixon,	Q. Those are different formats or different they look different than the e-mails	
2	Q. For example, if you go to exhibit let's see, I'm sorry. Page E.Dixon, E.Dixon 29. Are you at page E.Dixon 29?	Q. Those are different formats or different they look different than the e-mails sent on page E.Dixon 53, right? A. Correct. Q. And so the question is, are the ones	
2 3 4	Q. For example, if you go to exhibit let's see, I'm sorry. Page E.Dixon, E.Dixon 29. Are you at page E.Dixon 29?  A. Yep, I am.	Q. Those are different formats or different — they look different than the e-mails sent on page E.Dixon 53, right? A. Correct.	
2 3 4 5	<ul> <li>Q. For example, if you go to exhibit let's see, I'm sorry. Page E.Dixon,</li> <li>E.Dixon 29. Are you at page E.Dixon 29?</li> <li>A. Yep, I am.</li> <li>Q. That is an e-mail that you sent from</li> </ul>	Q. Those are different formats or different — they look different than the e-mails sent on page E.Dixon 53, right? A. Correct. Q. And so the question is, are the ones shown on E.Dixon 25, the ones in that format, were those sent from your laptop?	
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	Page 45		Page 47
1	laptop. Are you asking me if this was sent to you	1	accident, right?
2	from my phone or is it the communication made	2	A. Right, yes.
3	between John and me by per phone or laptop?	3	Q. And you didn't produce those in response
4	Q. Ms. Dixon, was page 53, E.Dixon 53, that	4	to the first subpoena, did you?
5	was not sent to me, was it? It was not sent to me	5	A. No, because I didn't remember that.
6	by you, was it?	6	Q. Go to page E.Dixon 11.
7	A. This is all what I produced.	7	A. Yep.
8	Q. That wasn't the question, Ms. Dixon.	8	Q. Well, first of all, starting on page 10,
9	The question was, page E.Dixon 53, was that sent to	9	go back just one page, this is an e-mail that you
10	me by you?	10	sent to John Meyer with all of your thoughts about
11	A. I did not send anything to you. I sent	11	the expert report of Mark Petrozzi, right?
12	it to Ms. Walas.	12	A. Correct.
13	Q. Right.	13	Q. You never issued a supplemental expert
14	A. Right.	14	report in this case, did you?
15	Q. So the answer is no, right?	15	A. What is that?
16	A. The answer is no.	16	Q. You don't know what it is? Did you ever
17	Q. Okay. There we go. So obviously, I	17	issue some report that you signed other than the
18	wouldn't be asking you how page E.Dixon 53 was sent	18	affidavit that we were provided?
19	to me by you, would I? Because that never	19	A. Did I ever issue a report? I don't
20	happened, right? Are you following along?	20	understand.
21	A. I was asked in the subpoena, the first	21	Q. Do you know what the word "prepare"
22	subpoena, and I did not do it because I didn't	22	means?
23	really understand what was going on. I'm sorry,	23	A. Right, yes.
24	I'm stupid. But when Ms. Walas told me that I had	24	Q. Did you ever prepare a report other than
25	to produce all this, I sent this to her because all	25	the affidavit
1 2	Page 46 the subpoenas are not coming directly from you. So it's the communication went between Ms. Walas	1 2	Page 48  A. This one.  Q that Mr. Meyer prepared?
3	and me.	3	A. I worked through this one here.
4	Q. I'm going to hand you what I've marked	4	Q. And you're looking at E.Dixon page 10?
5	as Exhibit 93. Hopefully I have the numbers	5	A. Yes.
6	correct.	6	Q. And that was never produced to us until
7	Exhibit 93, these are your e-mail	7	last week, right?
8	communications with John Meyer using his address	8	A. I don't know.
9	john@cottonwoodlaw.org, correct?	9	Q. You didn't produce this in response to
10	A. Correct. These are text messages.	10	the first subpoena, did you?
11	Q. Well, they're text messages to his	11	A. No.
12	e-mail address john@cottonwoodlaw.org, right?	12	Q. Go to page E.Dixon 11, and the first
13	A. Yeah.	13	paragraph there, review that to yourself. It
14	Q. In exhibit excuse me, Exhibit 93,	14	starts out "From a logical point of view." Let me
15	these communications, you failed to produce these	15	know when you're done with that paragraph.
16	in response to the first subpoena to you, didn't	16	A. Yep.
17	you?	17	Q. And right there what you said is "Once
18	A. Yes.	18	you get closer to the loop road the slope incline
19	Q. Can you go back to Exhibit 91. Do you	19	decreases and there is a depression on skiers
20	still have that in front of you?	20	right." And then you say, "From that distance the
21	A. Uh-huh.	21	loop road is not visible." Did I read that
22	Q. Let's just start at page E.Dixon 2.	22	correctly?
23	It's your e-mail with Steve Emerson.	23	A. That is correct, yep.
24	A. Yeah.	24	Q. And you now know that that what you
25	Q. Those are e-mails about John Meyer's	25	wrote right there on page E.Dixon 11, what I just
25	Q. Those are e-mails about John Meyer's	25	wrote right there on page E.Dixon 11, what I just

	Page 49		Page 51
1	read, you know that is false, don't you?	1	you were trying to rely on in this case for you,
2	A. It could be false, it could be true	2	right?
3	because I have not stand stood there lately in	3	A. I wanted to see the area, how it looks
4	the last few years.	4	now in 2020.
5	Q. Well, in fact someone recently sent you	5	Q. And when did Trina take these
6	pictures and you texted Mr. Meyer and said, "It's	6	photographs for you?
7	not really what I wanted to see. The loop road is	7	A. It was I think it was January.
8	still visible from up close." Isn't that true?	8	Q. And do you have your communications with
9	A. Yes.	9	Trina on your phone or in front of you?
10	Q. Okay. So what you wrote here that "From	10	A. No.
11	that distance the loop road is not visible," that's	11	Q. What did you do with them?
12	false, isn't it?	12	A. I deleted the pictures.
13	A. Yeah.	13	Q. Why did you delete the pictures?
14	Q. Who sent you the pictures recently of	14	A. Because I just wanted to see the area,
15	the area of Mr. Meyer's incident?	15	and I sent one picture to Ms. Walas, and then the
16	A. A friend of mine.	16	rest I didn't really need because they were taken
17	Q. Yeah. What's the friend's name?	17	in the wrong spot.
18	A. Her name is Trina.	18	Q. Well, you didn't send it to Ms. Walas,
19	Q. Trina what?	19	you sent it to Mr. Meyer, didn't you?
20	A. I don't know.	20	A. I don't remember. Probably to Ms. Meyer
21	Q. You don't know her last name?	21	because then I think we didn't I didn't have
22	A. No.	22	your phone number yet or.
23	Q. What is Trina's phone number?	23	Q. How many pictures did Trina send to you
24	A. Um, she's a friend of mine and I really	24	of the area of Mr. Meyer's accident scene?
25	don't want her to get in trouble, so I'm not going	25	A. The one that I wanted, it was one
	Page 50		Page 52
1	to tell you.	1	picture and then she took a few other pictures
2	Q. Okay. Ms. Dixon, I'm asking you to	2	where she wasn't certain where she should take it.
3	provide you have your phone here with you,	3	Q. How many pictures did Trina send you
4	right?	4	from Big Sky Resort?
5	A. Yeah.	5	A. Maybe 10. I don't remember.
6	Q. And you have Trina's number in your	6	Q. And you deleted all of those but one?
7	phone, don't you?	7	A. They are now deleted. All of them are
8	A. Yeah.	8	deleted.
9	Q. So will you give me her phone number,	9	Q. Turn to page E.Dixon 15.
10	please?	10	A. (Witness complies.)
11	A. What's going to happen to her?	11	Q. There's a thing that says P, and then
12	Q. Can you just please give me the phone	12	that is in bold, and then below that you write,
1 2	number, Ms. Dixon? And her last name when you look	13	"Yes skiers are responsible for their own safety!"
13		14	Correct?
13	it up.		
	it up.  A. I have not I don't have her last name	15	A. Correct.
14	•		<ul><li>A. Correct.</li><li>Q. And you agree with that, don't you?</li></ul>
14 15	A. I have not I don't have her last name	15	
14 15 16	A. I have not I don't have her last name here on my phone. 231-215-1624.	15 16	Q. And you agree with that, don't you?
14 15 16 17	A. I have not I don't have her last name here on my phone. 231-215-1624.  Q. Can you say that again, please? 231	15 16 17	<ul><li>Q. And you agree with that, don't you?</li><li>A. Yeah.</li><li>Q. That skiers are responsible for their own safety, right?</li></ul>
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14 15 16 17 18	A. I have not I don't have her last name here on my phone. 231-215-1624.  Q. Can you say that again, please? 231 A. 231-215-1624.  Q. 1624. And do you have Trina's last	15 16 17 18 19	<ul><li>Q. And you agree with that, don't you?</li><li>A. Yeah.</li><li>Q. That skiers are responsible for their own safety, right?</li></ul>
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14 15 16 17 18 19 20 21	A. I have not I don't have her last name here on my phone. 231-215-1624.  Q. Can you say that again, please? 231 A. 231-215-1624.  Q. 1624. And do you have Trina's last name?  A. No, it just says Trina.	15 16 17 18 19 20 21	<ul> <li>Q. And you agree with that, don't you?</li> <li>A. Yeah.</li> <li>Q. That skiers are responsible for their own safety, right?</li> <li>A. Yeah.</li> <li>Q. And on December 11, 2015, Mr. Meyer was</li> </ul>
14 15 16 17 18 19 20 21 22	A. I have not I don't have her last name here on my phone. 231-215-1624.  Q. Can you say that again, please? 231 A. 231-215-1624.  Q. 1624. And do you have Trina's last name?  A. No, it just says Trina.  Q. And you asked Trina to take pictures of	15 16 17 18 19 20 21 22	<ul> <li>Q. And you agree with that, don't you?</li> <li>A. Yeah.</li> <li>Q. That skiers are responsible for their own safety, right?</li> <li>A. Yeah.</li> <li>Q. And on December 11, 2015, Mr. Meyer was responsible for his own safety, right?</li> </ul>

Page 55 Page 53 1 Q. Because he's the only one that can A. Correct. 2 control where he goes and how fast he skis, right? 2 Q. Go to page E.Dixon 30. 3 3 A. (Witness complies.) 4 Q. Turn to page E.Dixon 18. 4 Q. That's an e-mail exchange between you 5 5 A. (Witness complies.) and Mr. Meyer and it's setting up a meeting between 6 6 Q. The first paragraph here you said, "When you and Mr. Meyer the day before your deposition, 7 7 your first deposition, right? I was out skiing I definitely did my job as a ski 8 patroller, marking hazards or obstacles or telling 8 A. Yeah. 9 supervisors and managers that there should be areas 9 Q. And you were specifically asked what you 10 10 did to prepare for your deposition, weren't you, in marked," do you see that? 11 11 your first deposition? A. No. 12 12 Q. The very first paragraph at the top of A. I don't remember. 13 13 Q. You had a meeting with Mr. Meyer less 14 A. Which page are we? 14 than 24 hours before your first deposition, didn't 15 Q. 18. 15 16 A. Do you mean before the time of the 16 A. Yeah. 17 17 incident, that paragraph? Q. And so when you were asked what you did 18 Q. Yes. The last sentence in that 18 to prepare for the deposition and you didn't 19 paragraph. 19 mention that meeting, that was a lie, wasn't it? 20 20 A. When I was out skiing, yep, I see it. A. Yep. 21 Q. So do you agree that when you were out 21 Q. Did Mr. Meyer tell you not to 22 skiing, you definitely did your job as a ski 22 communicate with me or anyone at Big Sky? 23 23 patroller, marking hazards or obstacles or telling A. I don't think so. supervisors and managers that there should be areas Q. Look at page E.Dixon 46. 24 24 25 marked? 25 A. (Witness complies.) Page 54 Page 56 A. Yes, we talked about some areas that 1 1 Q. Page E.Dixon 46 are texts that you and 2 should be marked. 2 Mr. Meyer exchanged, correct? 3 Q. And do you agree that you -- when you 3 A. Yeah. 4 4 were out skiing you did your job as a ski Q. And in one of the texts shown on page 5 patroller, marking hazards or obstacles? 5 E.Dixon 46, Mr. Meyer told you "Please do not 6 A. That is my job when I'm out skiing, yes. 6 communicate with Ian or anyone at Big Sky," didn't 7 7 Q. You've never marked the area of 8 8 Mr. Meyer's accident before December 11, 2015, did A. I guess it says there, yes. 9 9 Q. So back to my question. Mr. Meyer told 10 10 A. No, I barely really worked positions on you, Mr. Meyer told you do not communicate with Ian 11 11 Challenger, so. No, I didn't. or anyone at Big Sky, didn't he? 12 12 Q. Go to page E.Dixon 19. A. I think it was because I asked why I 13 A. (Witness complies.) 13 didn't get the subpoena or this document sent to Q. And there you write in the first 14 me. I asked the question, "Why am I not getting 14 this document sent to me?" And he said I don't 15 paragraph, "Yes from 200 feet above. But the 15 16 question is did he" -- being Mr. Meyer -- or could 16 need to communicate with you because it all goes 17 17 Mr. Meyer see it from 30 or 20 or 10 feet above. through him or through Ms. Walas. I don't know 18 18 That's what you wrote, right? 19 A. Yes. 19 Q. So, Ms. Dixon, my question is, did 20 2.0 Q. And you now know from the pictures that Mr. Meyer tell you "Please do not communicate with 21 21 Trina sent you, that Mr. Meyer could see the Loop Ian or anyone at Big Sky?" 22 22 Road from 30 or 20 or 10 feet above, couldn't he? A. Yes. 23 A. Possibly, yes. 23 Q. Mr. Meyer doesn't -- he's not your 24 Q. Well, if he was looking he could have, 24 lawyer, is he? 25 correct? 25 A. No.

	Page 57		Page 59
1	Q. I want to look go back to Exhibit 93.	1	A. No.
2	A. (Witness complies.)	2	Q. What other communications had you had
3	Q. Exhibit 93, these are your e-mails with	3	with Mr. Meyer about this lawsuit while this case
4	Mr. Meyer at cottonwoodlaw.org, correct?	4	was pending?
5	A. Correct.	5	A. Before this text message?
6	Q. And do you know why these are in a	6	Q. Yes.
7	phone, they look like a phone format?	7	A. About the lawsuit?
8	A. He sent out a text message from his	8	Q. Yes.
9	e-mail that came to my text messenger on the phone.	9	A. This one e-mail where he wanted to have
10	Q. And if you look at page the second	10	the e-mail addresses from the patrollers to provide
11	page of Exhibit 93, those are communications you	11	them. I don't know what he wanted to do. He told
12	were having with Mr. Meyer on October 19, 2018;	12	me he wants to provide patrollers with healthcare
13	correct?	13	and I sent him the e-mail addresses and I said good
14	A. 2018, yes.	14	luck.
15	Q. You were employed with Big Sky in	15	Q. Go back a couple pages within Exhibit 93
16	October of 2018, weren't you?	16	to page E.Dixon 66. Let me know when you're there.
17	A. Yeah.	17	A. Yep.
18	Q. And the lawsuit Mr. Meyer filed against	18	Q. Take a minute to review that. Please
19	Big Sky was pending in October of 2018, wasn't it?	19	let me know when you're done.
20	A. I guess. I was not aware what the	20	A. Yep.
21	lawsuit is going on or how it's going on because I	21	Q. This is a text exchange that you had
22	didn't really talk to him.	22	with Mr. Meyer in December of 2018, correct?
23	Q. And Mr. Meyer texted you and said	23	A. Correct.
24	that and texted you about what he claimed he was	24	Q. And you were employed by Big Sky in
25	going to do with the money if he received any money	25	December of 2018, correct?
	Page 58		Page 60
1	in the lawsuit, right?	1	A. Yeah.
2	A. That's correct.	2	Q. And you were a supervisor at Big Sky in
3	Q. While the lawsuit was pending, right?	3	December of 2018, correct?
4	A. Yeah, and that's where that e-mail came	4	A. Correct.
5	from, when I sent out the e-mail addresses because	5	(Whereupon, Deposition
6	he said he's going to provide healthcare for	6	Exhibit Number 95 was
7	patrollers.	7	marked for identification.)
8	Q. In response, you told him,	8	BY MR. McINTOSH:
9	Mr. Meyer you told Mr. Meyer I am not allowed	9	Q. I'm going to hand you what I've marked
10	to talk to you about this "this" was the	10	as Exhibit 95. Please take a minute to review
11	lawsuit anymore, right?	11	Exhibit Number 95 and let me know when you're done.
12	A. Correct.	12	A. Yeah.
13	Q. So that means you had been speaking with	13	Q. Do you agree that Exhibit 95 is a letter
14	Mr. Meyer about the lawsuit prior to October 19,	14	to Mr. Meyer?
15	2018; right?	15	A. Yes.
16	A. I don't remember when or what I talked	16	Q. And what's the date of the letter?
17	with Mr. Meyer before that.	17	A. December 27.
18	Q. Well, you specifically used the	18	Q. What year?
19	word I'm not allowed to talk to you about	19	A. 2017.
	this "anymore," right?	20	Q. Yeah. So that's one year before the
20	A. I said that here, yes.	21	text exchange that we were just looking at within
20 21		22	Exhibit 93, right?
	Q. So "anymore" means you had been having	""	_
21	communications	23	A. Yeah.
21 22		1	_

	Page 61	Page 6.	3
1	employees of Big Sky resort, correct?	1 A. When was the first deposition?	
2	A. Correct.	Q. January 24.	
3	Q. And in December of 2018, Mr. Dixon was	3 A. 24, and this was?	
4	inviting you over to his house for a drink and some	4 Q. December.	
5	appetizers, correct?	5 A. December. Because it was postponed I	
6	A. Correct.	6 think. Was the first deposition postponed?	
7	Q. And these texts right here, about going	7 Q. So my question is, page E.Dixon 77	
8	over to Mr. Meyer's house for a drink and some	8 within Exhibit 94, these are text messages between	
9	appetizers, demonstrate that your first deposition	9 you and Mr. Meyer less than one month before your	r
10	testimony when you said you didn't have any texts	deposition in January of 2020, correct?	
11	with Mr. Meyer about anything other than alpacas,	11 A. Right.	
12	this shows that that was false testimony, doesn't	12 Q. And in fact, if you just go back through	
13	it?	the next few pages starting at E.Dixon 77, and then	
14	A. Correct.	14 keep going through through page E.Dixon 83, kee	p
15	(Whereupon, Deposition	going through E.Dixon 85, all the way up through	
16	Exhibit Number 94 was	16 E.Dixon 86, those are all your texts with Mr. Meyer	
17	marked for identification.)	in the month before your first deposition, right?	
18	MR. McINTOSH: I'm going to next hand you	18 A. Yeah.	
19	what I've marked as Exhibit 94.	19 Q. In fact, you sent at least 48 texts back	
20	MS. WALAS: Oh, what was are we just going	and forth between you and Mr. Meyer in the single	
21	out of order?	21 month before your first deposition, didn't you?	
22	THE WITNESS: 95, you have this? 95, 93, 94.	A. Correct.	
23	BY MR. McINTOSH:	Q. And none of those texts are about	
24	Q. Okay. So you now have in front of you	24 pictures of your alpaca, are they?	
25	Exhibit 94?	25 A. No.	
	Page 62	Page 6	4
1	Page 62 A. Yep.	Page 6.  Q. So when you were asked on page 15 of	4
1 2			4
	A. Yep.	Q. So when you were asked on page 15 of	4
2	<ul><li>A. Yep.</li><li>Q. And Exhibit 94, these are your texts,</li></ul>	Q. So when you were asked on page 15 of your deposition, "Did you have any written	
2	A. Yep. Q. And Exhibit 94, these are your texts, the texts between you and Mr. Meyer, correct?	Q. So when you were asked on page 15 of your deposition, "Did you have any written correspondence either by e-mail, text, Facebook,	
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2 3 4 5 6	<ul> <li>A. Yep.</li> <li>Q. And Exhibit 94, these are your texts,</li> <li>the texts between you and Mr. Meyer, correct?</li> <li>A. Correct.</li> <li>Q. And these are blown up versions so we can actually read them, correct?</li> <li>A. Yeah.</li> <li>Q. And you did not produce these in</li> </ul>	Q. So when you were asked on page 15 of your deposition, "Did you have any written correspondence either by e-mail, text, Facebook, any method with Mr. Meyer," you answered "Probabl thanking him for the pictures he took of my alpacas." You were then asked "Anything else?" And you said "No," didn't you?	
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	Page 65	Page 67
1	way, then yes, I wasn't aware that this was all	1 obligation to produce any pictures of the accident
2	important. I am not a legal expert.	2 scene that he had?
3	Q. Do you think you need to be a legal	3 A. No.
4	expert to answer a question that says "Anything	4 Q. Did Mr. Meyer tell you not to delete any
5	else"?	5 of the photographs?
6	A. Yeah.	6 A. No.
7	Q. What's confusing about that, when	7 Q. And these pictures show that if
8	somebody says "Anything else"? How does that	8 Mr. Meyer was looking ahead of him, even just two
9	confuse you?	9 turns ahead of him, he should have seen the Loop
10	A. It was not clear to me that anything	10 Road, right?
11	that John Meyer and I talked about after he hired	A. If he came down this way, yes.
12	me as an expert witness, that I had to provide all	Q. This picture shows that this accident,
13	this. It was only my understanding that because	13 Mr. Meyer's incident where he claimed that he went
14	that was the focus that I'm not talking to him	onto the cat track, was entirely his fault, doesn't
15	during my employment and I was certain that I	15 it?
16	didn't talk to him during my employment about his	A. Well, this picture was taken in 2020.
17	case.	Q. Okay. So if the scene of the strike
18	Q. Look at page 82 of excuse me, page	18 that.
19	E.Dixon 82 within Exhibit 94.	19 So if you can see the Loop Road from up
20	A. (Witness complies.)	close at the time of Mr. Meyer's accident, that
21	Q. That is the photograph that Trina sent	means that the incident was entirely Mr. Meyer's
22	to you, correct?	22 fault, doesn't it?
23	A. Yeah.	A. According to this picture in 2020. But
24	Q. And you sent that photograph to	the picture that he had from 2015, that probably
25	Mr. Meyer on when, January 20 of 2020; is that	25 one of my accident investigators took, looked
	Page 66	Page 68
1	Page 66 correct? Excuse me, January 13 of 2020; is that	1 different. Snow conditions change.
1 2	correct? Excuse me, January 13 of 2020; is that right?	<ol> <li>different. Snow conditions change.</li> <li>Q. Look at Exhibit 29 in front of you.</li> </ol>
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	Page 69		Page 71
1	A. Yeah.	1	talked.
2	Q. Go to page 83 of Exhibit 94, please.	2	Q. Go to page E.Dixon 85 within Exhibit 94.
3	Let me know when you're there. Take your time	3	A. (Witness complies.)
4	reviewing it, please.	4	Q. Are you there?
5	A. Yeah.	5	A. Yeah.
6	Q. And here you are texting back and forth	6	Q. And have you reviewed page E.Dixon 85?
7	with Mr. Meyer about the witness that was recently	7	A. Um, yep.
8	deposed in this case, Tom McMakin, right?	8	Q. And these are text messages you had with
9	A. Yeah.	9	Mr. Meyer just days before your deposition on
10	Q. And well, first of all, you never	10	January 24, 2020; right?
11	reviewed Mr. Meyer's deposition transcript, right?	11	A. Correct.
12	A. I don't think I ever saw it.	12	Q. So when you were testifying on January
13	Q. Okay. So you don't know what he said	13	24, 2020, you knew that you had had text messages
14	about his accident and about how it occurred in his	14	with Mr. Meyer within the past couple days,
15	deposition, do you?	15	correct?
16	A. I don't know what he said. I don't.	16	A. Correct.
17	Q. Right. I mean, you didn't review the	17	Q. 96.
18	transcript	18	MS. WALAS: Ian, can we go ahead and take a
19	A. Yeah.	19	break?
20	Q so you don't know what he said?	20	MR. McINTOSH: Sure, seeing how much I
21	A. Right.	21	screwed up the numbers.
22	Q. But here Mr. Meyer, in his text to you,	22	VIDEO TECHNICIAN: This ends Disc Number 1.
23	is texting you and telling you how he claims his	23	We're off the record. The time is 11:25.
24	incident occurred, right, at the bottom of page 83	24	(Whereupon, a brief
25	and the top of page 84?	25	recess was taken.)
			- F0
	Page 70		Page 72
1	A. Yep.	1	VIDEO TECHNICIAN: This starts Disc Number 2.
2	Q. And then Mr. Meyer says "We'll see what	2	We're back on the record. The time is 11:31.
3	the witness says," correct?	3	BY MR. McINTOSH:
4	A. Yeah.	4	Q. Ms. Dixon, we're back under oath and do
5	Q. And that's on page E.Dixon 84 within	5	you understand that you are sworn to tell the truth
6	Exhibit 94, right?	6	here?
7	A. Yeah.		
		7	A. Yep.
8	Q. And then he says "Not over text," do you	8	Q. During a break were you in the restroom
8 9	see that?	8 9	Q. During a break were you in the restroom with Ms. Walas?
8 9 10	see that? A. Yeah.	8 9 10	Q. During a break were you in the restroom with Ms. Walas? A. Yes.
8 9 10 11	see that? A. Yeah. Q. Why did Mr. Meyer want to make a written	8 9 10 11	Q. During a break were you in the restroom with Ms. Walas? A. Yes. Q. And what did you discuss?
8 9 10 11 12	see that? A. Yeah. Q. Why did Mr. Meyer want to make a written record of his communications with you?	8 9 10 11 12	<ul> <li>Q. During a break were you in the restroom with Ms. Walas?</li> <li>A. Yes.</li> <li>Q. And what did you discuss?</li> <li>A. I asked her if I'm going to go to</li> </ul>
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8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	see that? A. Yeah. Q. Why did Mr. Meyer want to make a written record of his communications with you? MS. WALAS: Objection, calls for speculation. THE WITNESS: I have no idea. I can't be in his mind. BY MR. McINTOSH: Q. What did you discuss with Mr. Meyer after he said to you "Not over text"? A. I don't remember. Q. Well, what did you discuss with him about the photograph that you sent him that shows the Loop Road is visible from immediately above it?	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. During a break were you in the restroom with Ms. Walas?  A. Yes. Q. And what did you discuss? A. I asked her if I'm going to go to prison. Q. Anything else? A. What if I'm going to start crying. Q. Anything else? A. How I'm doing. Q. And what did she say in response to all those questions? A. Answering the best that you can. Q. What did she say in response to your question about am I going to go to prison?

	Page 73		Page 75
1	A. No.	1	Q '19?
2	(Whereupon, Deposition	2	A. (Witness nods head.)
3	Exhibit Number 96 was	3	Q. And what did you believe was the reason
4	marked for identification.)	4	you were being asked not to come back to work at
5	BY MR. McINTOSH:	5	Big Sky?
6	Q. Exhibit 96 that has been placed in front	6	A. What did I believe?
7	of you, those are your Facebook messages with	7	Q. Yes.
8	Mr. Meyer; is that right?	8	A. Because of my divorce from Bob and
9	A. Looks like it, yep.	9	everything that happened before that.
10	Q. And within 96 are numerous messages you	10	Q. And in fact, you posted some derogatory
11	had with Mr. Meyer while you were employed by Big	11	e-mails on a public Facebook page, correct?
12	Sky, right?	12	A. E-mails?
13	A. Yes.	13	Q. You posted on a public Facebook page,
14	Q. And in fact, as we see in Exhibit 96, in	14	you posted
15	January of 2019, Mr. Meyer was asking to stop by	15	A. Yes.
16	your place, right?	16	Q some derogatory things, didn't you?
17	A. Um, yes.	17	A. What's "derogatory" mean?
18	Q. If we look at page E.Dixon 94, we see a	18	Q. Mean, bad.
19	text from Mr. Meyer saying "I hope you're well	19	A. No, it wasn't mean or bad. It was the
20	today, are you around"?	20	truth.
21	A. Yeah.	21	Q. What did you say on the Facebook post
22	Q. And this is in January of 2019, right?	22	that you made?
23	A. Correct.	23	A. I said about all the lies that I had to
24	Q. When you were employed by Big Sky,	24	suffer through and all what Bob didn't tell me
25	correct?	25	about his manhood, I don't know. Do I have to
	Page 74		Page 76
1	A. Correct.	1	really say that here? I mean there's Bob's boss
2	Q. While you were a supervisor at Big Sky,	2	sitting here.
3	right?	3	Q. Well, I want to know what you posted and
4	A. Yeah.	4	why you believe your employment at Big Sky
5	Q. And this is also just a couple months	5	terminated?
6	before Mr. Meyer was deposed in April of 2019,	6	A. Because of that Facebook post.
7	right?	7	(Whereupon, Deposition
8	A. I don't know.	8	Exhibit Number 89 was
9	Q. Well, if he was deposed in April of	9	marked for identification.)
10	2019, then this is just a couple months before,	10	BY MR. McINTOSH:
11	right?	11	Q. I'm going to hand you what I've marked
12	A. It's January 14. I don't know when his	12	as Exhibit 89. Let me know when you're done
13	deposition was.	13	reviewing Exhibit 89, please.
14	Q. And did Mr. Meyer stop by your place in	14	A. Yeah.
15	January of 2019?	15	Q. Are you done reviewing it?
16	A. I don't remember.	16	A. Yeah.
17	Q. When did your employment with Big Sky	17	Q. Exhibit 89 is an e-mail exchange between
18	end?	18	you and Ryan Ayres, correct?
19	A. Well, it's a seasonal employment that	19	A. It's my e-mail that I sent to him and
,,,,	ends in April after the season.	20	underneath is that he told me that I'm not being
20	Q. When were you asked or informed that you	21	rehired.
21	11 (1 1 1 1 2 1 1 2		
21 22	would not be asked to come back?	22	Q. Okay. So do you agree that Exhibit 89
21 22 23	A. Two weeks before the refresher.	23	is the e-mail exchange between you and Mr. Ayres
21 22			

	Page 77		Page 79
1	A. Yeah.	1	A. April 2019.
2	Q. So does that seem like the correct date	2	Q. Earlier in this case you said that you
3	to you when your employment ended, October 6, 2019?	3	were, quote, "surrounded by liars." Who were you
4	A. Yeah.	4	referring to when you said that?
5	Q. And then you told Mr. Ayres that I know	5	A. Earlier in this case?
6	it's because of the post I did in June, right?	6	Q. Earlier in the deposition today.
7	A. Yep.	7	A. Uh-huh. I was actually referring to
8	Q. And what was the post you did in June?	8	Bob.
9	A. The one that I just mentioned before.	9	Q. Anyone else?
10	Q. And what did you say in that post?	10	A. Yeah. My granddaughter's mother. There
11	A. That's what I just said.	11	was lots of lying around me.
12	Q. What sort of insults? How were you	12	Q. Do you believe Mr. Meyer has been
13	being insulted?	13	truthful in his dealings with you?
14	A. Because somebody several people asked	14	A. I hope so.
15	me if I'm a lesbian.	15	Q. Do you believe he's been truthful about
16	Q. And you took that to be an insult?	16	his ski wreck?
17	A. Yes.	17	A. I have to believe that. But you never
18	Q. Did you share your user name and	18	know who is not truthful and who, I mean. You have
19	password when you gave Mr. Meyer your Big Sky	19	to discover that time by time.
20	laptop computer?	20	Q. Let's take a short break and then I
21	A. No.	21	think I'm probably done.
22	Q. Did you share your user name and	22	VIDEO TECHNICIAN: We are now going off the
23	password with anyone?	23	record. The time is 11:41.
24	A. No.	24	(Whereupon, a brief
25	Q. Did you ever e-mail Mr. Meyer from your	25	recess was taken.)
	Page 78		Page 80
1	Page 78 Big Sky laptop?	1	Page 80 VIDEO TECHNICIAN: We're now back on the
1 2		1 2	
	Big Sky laptop?		VIDEO TECHNICIAN: We're now back on the
2	Big Sky laptop?  A. I don't remember. Probably when I sent	2	VIDEO TECHNICIAN: We're now back on the record. The time is 11:44.
2	Big Sky laptop?  A. I don't remember. Probably when I sent him the yellow card. That must have come from the	2 3	VIDEO TECHNICIAN: We're now back on the record. The time is 11:44. BY MR. McINTOSH:
2 3 4	Big Sky laptop?  A. I don't remember. Probably when I sent him the yellow card. That must have come from the Big Sky laptop.	2 3 4	VIDEO TECHNICIAN: We're now back on the record. The time is 11:44. BY MR. McINTOSH:  Q. Ms. Dixon, just a couple more questions.
2 3 4 5	Big Sky laptop?  A. I don't remember. Probably when I sent him the yellow card. That must have come from the Big Sky laptop.  Q. Do you recall any other e-mails with Mr. Meyer other than e-mailing him the yellow card?  A. I don't recall any other e-mails, no.	2 3 4 5	VIDEO TECHNICIAN: We're now back on the record. The time is 11:44. BY MR. McINTOSH:  Q. Ms. Dixon, just a couple more questions. First of all, do you understand you are
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Big Sky laptop?  A. I don't remember. Probably when I sent him the yellow card. That must have come from the Big Sky laptop.  Q. Do you recall any other e-mails with Mr. Meyer other than e-mailing him the yellow card?  A. I don't recall any other e-mails, no.  Q. Have you used any other e-mail address or e-mail addresses when communicating with Mr. Meyer?  A. I have my own e-mail addresses, a little Apple tech and gmail.  Q. What are your e-mail addresses?  A. Evidixon@littleappletech.com and evidixon@gmail.com.  Q. Did you say evidixon@littleappletech.com and evidixon@gmail.com?  A. Correct.  Q. Are those the only e-mail addresses you have used?  A. Well, then I had Big Sky's e-mail address, edixon@bigskyresort.com. I can't get to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	VIDEO TECHNICIAN: We're now back on the record. The time is 11:44. BY MR. McINTOSH:  Q. Ms. Dixon, just a couple more questions. First of all, do you understand you are still under oath?  A. I do. Q. And what does that mean to you to be under oath?  A. Answer as truthfully as I can get. Q. The Big Sky laptop that you gave to Mr. Meyer to provide to us when you received the first subpoena, do you recall doing that?  A. Yeah. Q. Why did you still have that laptop? A. Because I always kept it over the summer because I was always asked a question throughout the summer. Q. Did you delete anything from the Big Sky laptop that Mr. Meyer produced? A. No, I don't think so. Q. What do you mean you don't think so?

	Page 81	Page 83
1	are full and delete some. So I might have deleted	were asked of you while giving deposition testimony
2	some e-mails that I got, but I don't think so.	2 in this case?
3	Q. Did you intentionally delete your	3 A. I think I understood them all. If I
4	e-mails with Mr. Meyer from that laptop?	4 didn't, I guess I was asked again.
5	A. Well, as I said, I don't remember	5 Q. And when answering a question, is it
6	anything, deleting any specific e-mails. I just	6 subject to your understanding of the question how
7	created more space in the outbox or inbox.	you give an answer?
8	Q. So you don't remember one way or another	8 MR. McINTOSH: Objection, leading.
9	whether you deleted your e-mails with Mr. Meyer?	9 THE WITNESS: Yes.
10	A. Definitely not last summer because I	10 BY MS. WALAS:
11	didn't get access to my I didn't even open my	Q. And prior to your first deposition,
12	computer up, so I never tried if I could still	January 24th, you received a subpoena, correct?
13	access it.	13 A. Yeah.
14	Q. Had you deleted e-mails with Mr. Meyer	14 Q. And did you understand what you were
15	before last summer, before the summer of 2019?	supposed to produce after you got that subpoena?
16	A. I don't think so. I don't know. I	16 A. Possibly not, because I didn't produce
17	don't know.	what I was supposed to produce but I I thought
18	Q. That's all the questions I have right	18 it was concerning during my employment. I and I
19	now. Thank you.	19 didn't take it too serious I guess. I'm not a
20	A. Uh-huh.	20 legal person.
21		Q. Okay. And after your first deposition
22	EXAMINATION	on January 24th, did you understand better what you
23	BY MS. WALAS:	23 were supposed to have produced?
24	Q. I'm just going to ask a few follow-up,	24 A. Yeah.
25	Ms. Dixon.	25 Q. And is that why you were able to produce
	Page 82	Page 84
1	Page 82  You were asked about lying in your	Page 84  1 more documentation after that deposition?
1 2		
	You were asked about lying in your	1 more documentation after that deposition?
2	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.	1 more documentation after that deposition? 2 A. Yes. 3 Q. Okay. And you were shown Exhibit 91, if 4 you want to grab that.
2	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.	1 more documentation after that deposition? 2 A. Yes. 3 Q. Okay. And you were shown Exhibit 91, if
2 3 4	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made	1 more documentation after that deposition? 2 A. Yes. 3 Q. Okay. And you were shown Exhibit 91, if 4 you want to grab that. 5 A. Yeah. 6 Q. And you were asked about E.Dixon 1, a
2 3 4 5	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made any false statements during your January 24th	<ul> <li>more documentation after that deposition?</li> <li>A. Yes.</li> <li>Q. Okay. And you were shown Exhibit 91, if</li> <li>you want to grab that.</li> <li>A. Yeah.</li> <li>Q. And you were asked about E.Dixon 1, a</li> <li>letter from Mr. Meyer, correct?</li> </ul>
2 3 4 5 6 7 8	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made any false statements during your January 24th deposition?	1 more documentation after that deposition? 2 A. Yes. 3 Q. Okay. And you were shown Exhibit 91, if 4 you want to grab that. 5 A. Yeah. 6 Q. And you were asked about E.Dixon 1, a 1 letter from Mr. Meyer, correct? 8 A. Correct.
2 3 4 5 6 7 8	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made any false statements during your January 24th deposition?  A. No.	more documentation after that deposition? A. Yes. Q. Okay. And you were shown Exhibit 91, if you want to grab that. A. Yeah. Q. And you were asked about E.Dixon 1, a letter from Mr. Meyer, correct? A. Correct. Q. And what's the date of that letter?
2 3 4 5 6 7 8 9	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made any false statements during your January 24th deposition?  A. No.  Q. Have you made any knowingly false	1 more documentation after that deposition? 2 A. Yes. 3 Q. Okay. And you were shown Exhibit 91, if 4 you want to grab that. 5 A. Yeah. 6 Q. And you were asked about E.Dixon 1, a 7 letter from Mr. Meyer, correct? 8 A. Correct. 9 Q. And what's the date of that letter? 10 A. December 11, 2019.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made any false statements during your January 24th deposition?  A. No.  Q. Have you made any knowingly false statements today?  A. No.  Q. Have you tried to hide anything when giving testimony in this case?  A. No.  Q. Have you tried to hide anything when	1 more documentation after that deposition? 2 A. Yes. 3 Q. Okay. And you were shown Exhibit 91, if 4 you want to grab that. 5 A. Yeah. 6 Q. And you were asked about E.Dixon 1, a 7 letter from Mr. Meyer, correct? 8 A. Correct. 9 Q. And what's the date of that letter? 10 A. December 11, 2019. 11 Q. Okay. And the Exhibit 91 in front of 12 you, if you can take a look at that and do you know 13 if any of the documents produced in there are from 14 before December 11th, 2019? 15 A. Um, I don't think so. 16 MR. McINTOSH: I'm going to object. The
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made any false statements during your January 24th deposition?  A. No.  Q. Have you made any knowingly false statements today?  A. No.  Q. Have you tried to hide anything when giving testimony in this case?  A. No.  Q. Have you tried to hide anything when responding to subpoenas in this case?	more documentation after that deposition?  A. Yes.  Q. Okay. And you were shown Exhibit 91, if you want to grab that.  A. Yeah.  Q. And you were asked about E.Dixon 1, a letter from Mr. Meyer, correct?  A. Correct.  Q. And what's the date of that letter?  A. December 11, 2019.  Q. Okay. And the Exhibit 91 in front of you, if you can take a look at that and do you know if any of the documents produced in there are from before December 11th, 2019?  A. Um, I don't think so.  MR. McINTOSH: I'm going to object. The records speak for themselves.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made any false statements during your January 24th deposition?  A. No.  Q. Have you made any knowingly false statements today?  A. No.  Q. Have you tried to hide anything when giving testimony in this case?  A. No.  Q. Have you tried to hide anything when responding to subpoenas in this case?  A. No.	more documentation after that deposition? A. Yes. Q. Okay. And you were shown Exhibit 91, if you want to grab that. A. Yeah. Q. And you were asked about E.Dixon 1, a letter from Mr. Meyer, correct? A. Correct. Q. And what's the date of that letter? A. December 11, 2019. Q. Okay. And the Exhibit 91 in front of you, if you can take a look at that and do you know if any of the documents produced in there are from before December 11th, 2019? A. Um, I don't think so. MR. McINTOSH: I'm going to object. The records speak for themselves. THE WITNESS: I think it's all after. Yes,
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	You were asked about lying in your previous deposition, do you remember that?  A. I was asked about lying?  Q. Yes.  A. Yes, uh-huh.  Q. Okay. And have you knowingly made any false statements during your January 24th deposition?  A. No.  Q. Have you made any knowingly false statements today?  A. No.  Q. Have you tried to hide anything when giving testimony in this case?  A. No.  Q. Have you tried to hide anything when responding to subpoenas in this case?  A. No.  Q. Have you done your best in answering your questions when giving testimony?	more documentation after that deposition?  A. Yes.  Q. Okay. And you were shown Exhibit 91, if you want to grab that.  A. Yeah.  Q. And you were asked about E.Dixon 1, a letter from Mr. Meyer, correct?  A. Correct.  Q. And what's the date of that letter?  A. December 11, 2019.  Q. Okay. And the Exhibit 91 in front of you, if you can take a look at that and do you know if any of the documents produced in there are from before December 11th, 2019?  A. Um, I don't think so.  MR. McINTOSH: I'm going to object. The records speak for themselves.  THE WITNESS: I think it's all after. Yes, this is December, February, yeah. No. Um, we are going back to the e-mails here, January. August
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1	we're back to after this December 11th, again,	1	Q. And you were asked about some text
2	February, in February. I think we besides this	2	messages on E.Dixon 66 from December of 2018?
3	one is before and everything else is after.	3	A. Uh-huh.
4	Q. Okay. So following up, everything	4	Q. Do you recall that questioning?
5	produced after your first deposition appears to be	5	A. Yeah.
6	correspondence dated after December 11th, except	6	Q. Okay. And did you go to the party
7	for E.Dixon 32 to, I believe you said, 36?	7	Mr. Meyer invited you to?
8	A. Uh-huh.	8	A. If that was the get-together in the
9	Q. And if you'll go ahead and take a look	9	canyon at their old house, then yes, I was there.
10	at E.Dixon 32 and that e-mail exchange from August	10	Q. Do you recall if when that party was
11	4th, 2016.	11	at the house in the old canyon?
12	A. Uh-huh. That wasn't to me. It	12	A. It was well, according to these text
13	was it says "Dear Governor Bullock."	13	messages, some appetizers, December in December
14	Q. So in your opinion, did this e-mail	14	2018.
15	exchange have anything to do with the lawsuit?	15	Q. Okay. And if you turn to the next page
16	MR. McINTOSH: Objection, calls for opinion.	16	E.Dixon 67.
17	THE WITNESS: No, he's writing about his	17	A. Yeah.
18	mother and women's wages. I don't even remember	18	Q. What did you tell him at the top of that
19	that e-mail.	19	page?
20	BY MS. WALAS:	20	A. "I got home just now and still have to
21	Q. Okay. So that e-mail hasn't influenced	21	feed my alpacas. Then up at 4 am again tomorrow
22	any of the opinions you have given in this case or	22	morning. Hopefully some other time. Have a great
23	the testimony you've given?	23	evening!"
24	A. No.	24	Q. Okay. So looking at that text message,
25	Q. Okay. Would you go ahead and take a	25	it appears that you didn't go to their home in
	Page 86		Page 88
1	look at Exhibit 93 that you were given.	1	December of 2018 but there may have been another
2	look at Exhibit 93 that you were given.  A. Okay.	2	December of 2018 but there may have been another instance?
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	Page 89		Page 91
1	Mr. Meyer"?	1	A. Yes.
2	A. Yeah.	2	Q. And do you know who did you meet with
3	Q. And you were asked to read what you had	3	the day before your deposition?
4	written underneath the bold print, correct?	4	A. With you.
5	A. Uh-huh.	5	Q. Okay. And do you know if I asked
6	Q. And what portion of that were you asked	6	Mr. Meyer to set up that meeting for me?
7	about?	7	A. Yes.
8	A. Oh, I don't know if I read this or had	8	Q. Now you were asked if you've reviewed
9	to read this but, Ian asked me if I think that	9	Mr. Meyer's deposition testimony, correct?
10	Mr. Meyer's responsible for his own for his own	10	A. Yeah.
11	fall or accident, I don't know.	11	Q. And you have not, correct?
12	Q. And what did you say?	12	A. Yeah.
13	MR. McINTOSH: Objection. The document	13	Q. Have you had any conversations with
14	speaks for itself, hearsay.	14	Mr. Meyer about this accident and what he recalls
15	BY MS. WALAS:	15	happened?
16	Q. Well, you wrote this document, correct?	16	A. Before my first deposition?
17	A. So the bold print is from the Mr. P,	17	Q. Yes.
18	Petrozzi or however you say his name, and I wrote	18	A. Yeah.
19	underneath.	19	Q. And did those conversations with
20	Q. Okay. And what did you write?	20	Mr. Meyer influence the opinions you gave in this
21	MR. McINTOSH: Objection. Hold on.	21	case?
22	Objection; undisclosed expert opinion, hearsay, and the document speaks for itself.	22 23	A. No.
23 24	MS. WALAS: You can answer.	24	Q. And you were also asked about your
25	THE WITNESS: So I can read? Should I read	25	employment with Big Sky ending?  A. Yeah.
25	THE WITNESS. SO I can read? Should I read	23	A. Ican.
	Page 90		Page 92
1	what I said? "Yes skiers are responsible for their	1	Q. And what was your reasoning again that
1 2	what I said? "Yes skiers are responsible for their own safety! Not repeating the statement of 'what	1 2	Q. And what was your reasoning again that you believe that your employment ended with Big
	what I said? "Yes skiers are responsible for their own safety! Not repeating the statement of 'what was there to be seen' et cetera. If he would have	2 3	Q. And what was your reasoning again that you believe that your employment ended with Big Sky?
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2 3 4 5 6	what I said? "Yes skiers are responsible for their own safety! Not repeating the statement of 'what was there to be seen' et cetera. If he would have seen the cat track he would not have been fallen over it. It is not the case that Mr. Meyer was skiing totally out of control or sliding down the	2 3 4 5 6	Q. And what was your reasoning again that you believe that your employment ended with Big Sky?  A. Because I posted on Facebook about what my husband did to me.  Q. Okay. And were you hurt by what
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	what I said? "Yes skiers are responsible for their own safety! Not repeating the statement of 'what was there to be seen' et cetera. If he would have seen the cat track he would not have been fallen over it. It is not the case that Mr. Meyer was skiing totally out of control or sliding down the slope. He was just skiing and probably did not see the cat track."  Q. Okay. And when you were asked about that earlier in your deposition, you were only asked about the first part of your statement there, correct?  A. Uh-huh, yes. Q. Okay. Go ahead and turn to what's been marked — what's E.Dixon 19 in that same document. A. (Witness complies.) Q. And do you recall being asked questions about the statement you made at the top of that page about 200 feet above?  A. (Witness shakes head.) Q. You don't recall being asked about that? A. No. Q. Okay. If you'd go ahead and turn to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. And what was your reasoning again that you believe that your employment ended with Big Sky?  A. Because I posted on Facebook about what my husband did to me.  Q. Okay. And were you hurt by what happened in your marriage with Bob?  A. Very.  Q. And was that post reflective of that?  A. I posted it because I was tired of lying for him, and as soon as I knew all the lies, which was early in our marriage, I was already working in Big Sky and I covered it up for him out of respect to him and it hurt.  Q. And if I remember correctly from your first deposition, have you and Bob reconciled in terms of are on a friendly basis?  A. Well, I'm a friendly person so I'm talking to him as a normal human being. We still we got divorced in October and there's still some paperwork that needed to be exchanged
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1	does that influence your testimony here?	1	Facebook, between the date of his accident in
2	A. No, I can no.	2	December of 2015 and December of 2019?
3	Q. And did not being rehired at Big Sky	3	A. I don't know. Let's count them.
4	influence the conclusions and opinions you gave in	4	Q. Hundreds?
5	this case?	5	A. Well, I have not counted the messages.
6	A. No.	6	Q. And have you produced all of
7	Q. And I believe you were asked at the very	7	your have you now produced all of your text
8	beginning of your deposition about Facebook	8	messages with Mr. Meyer?
9	messages and text messages and things such as that	9	A. Yes.
10	and you mentioned a birthday message?	10	Q. Have you now produced all of your
11	A. Yeah.	11	e-mails with Mr. Meyer?
12	Q. And you said you have that on your	12	A. Yes.
13	phone?	13	Q. And when you responded to the subpoena,
14	A. Yeah.	14	the first subpoena that you received, you were
15	Q. And if you'll go ahead and since it	15	working with Mr. Meyer and he was helping you
16	wasn't produced, we'll go ahead and read it into	16	respond, right?
17	the record.	17	A. We had communication.
18	MR. McINTOSH: Okay.	18	Q. About the subpoena, right?
19	THE WITNESS: I said, "Happy Birthday, John.	19	A. Yeah, uh-huh.
20	Hope you will be celebrated. How are you?"	20	Q. And he's a lawyer, right?
21	BY MS. WALAS:	21	A. Yeah.
22	Q. And did he respond?	22	MR. McINTOSH: That's all I have. Thank you,
23	A. He did respond. He says, "Hi Evi.	23	Ms. Dixon.
24	Thank you for the Birthday wishes. I'm doing well.	24	THE WITNESS: Uh-huh.
25	The babies ensure [sic], I don't get much sleep.	25	MS. WALAS: I don't have anything else. I
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1	But if that is my biggest complaint, I'm in good	1	just shook my head.
2	shape. Let's chat tomorrow afternoon. Don't	2	VIDEO TECHNICIAN: This now ends the
3	forget you can never go wrong with the truth."	3	deposition. The time is 12:06 p.m.
4	Q. And have you spoken to Mr. Meyer since	4	of contain the time is 12100 pinn
5	you had that conversation?	5	(Whereupon, the taking
6	A. No.	6	of this videotaped deposition
7	MS. WALAS: I don't have anything further.	7	was concluded at 12:06 p.m.)
8	RE-EXAMINATION	8	1 /
9	BY MR. McINTOSH:	9	
10	Q. Ms. Dixon, are those all your	10	SIGNATURE WAIVED
11	communications with Mr. Meyer that you've sent	11	
12	recently?	12	
13	A. On my phone?	13	* * * * * * *
14	Q. Yes.	14	
15	A. That I sent since October 20, 2019,	15	
16	there is one and then the next one is a happy	16	
17	birthday message.	17	
18	Q. Can I review those to make sure they've	18	
19	all been produced?	19	
20	A. Sure.	20	
21	Q. And what you're showing me are your	21	
22	messages with Mr. Meyer on Facebook, correct?	22	
23	A. Those are on Facebook, yes.	23	
24	Q. How many communications did you have	24	
25	with Mr. Meyer, whether by text, e-mail or	25	
21 22 23 24	<ul> <li>Q. And what you're showing me are your messages with Mr. Meyer on Facebook, correct?</li> <li>A. Those are on Facebook, yes.</li> <li>Q. How many communications did you have</li> </ul>	21 22 23 24	

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1	CERTIFICATE STATE OF MONTANA	
2	STATE OF MONTANA ) ) ss.	
4	COUNTY OF GALLATIN )	
5	I, Marla Jeske, Court Reporter - Notary	
6	Public, CSR, in and for the County of Gallatin,	
7	State of Montana, do hereby certify:	
8	That the witness in the foregoing	
9	deposition was by me first duly sworn to testify	
10	the truth, the whole truth and nothing but the	
11	truth in the foregoing cause; that the deposition	
12	was then taken before me at the time and place	
13	herein named; that the deposition was reported by	
14	me in shorthand and later transcribed into	
15	typewriting under my direction, and the foregoing	
16	pages contain a true record of the testimony of the	
17	witness, all done to the best of my skill and	
18	ability.	
19	IN WITNESS WHEREOF, I have hereunto set	
20	my hand and affixed my notarial seal this day	
21	of, 2020.	
22		
23	Notary Public for the State of Montana	
24	residing at: Bozeman	
25	My commission expires: February 04, 2023	

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